

Appendix 2



NATIONAL COURT REPORTERS INC

SERVING LEGAL PROFESSIONALS COAST TO COAST AND INTERNATIONALLY

In The Matter Of

La Union Del Pueblo Entero, et al.,

Plaintiffs

v

State Of Texas, et al.,

Defendants

CASE

5:21-cv-844

Date

5-6-2022

Witness

Brian Keith Ingram, JD

Volume II of II

**Certified Copy
Transcript**

National Court Reporters Inc. • 888.800.9656 •

NationalCourtReporters.com

NCRNetwork@nationalcourtreporters.com

Serving Legal Professionals From Coast To Coast and Internationally

5:21-cv-844 (XR)
5/6/2022

Entero v Texas
NATIONAL COURT REPORTERS INC 888.800.9656

Brian Keith Ingram JD 263

263

1 **A. I did not.**

2 Q. Did she in any way explain to you why she
3 wanted to replace record turnout with emphasis on smooth
4 safe, secure elections?

5 **A. Well, the whole intent of this was to commend**
6 **the counties and the public on having a smooth, safe,**
7 **and secure election in the middle of a pandemic.**

8 Q. So my question to you was: Did she in any way
9 explain to you why she wanted to replace record turnout
10 with emphasis on smooth, safe, secure elections?

11 **A. She didn't explain it to me, but it is**
12 **consistent with the intent of this press release.**

13 Q. And how does Ms. Hughs define the word "smooth,
14 safe and secure"?

15 **A. "Smooth, safe and secure" just means exactly**
16 **what I said it meant in my last deposition, which is**
17 **that the -- the election went well, it was not a**
18 **super-spreader event in the middle of a pandemic.**

19 Q. Okay.

20 **A. It was -- it was a relatively problem-free**
21 **election, there -- you know, that's not to say there**
22 **weren't problems, there were, but it was relatively**
23 **problem-free and considering the circumstances it was**
24 **exceptionally problem-free.**

25 MS. OLSON: I am going to object as

5:21-cv-844 (XR)
5/6/2022

Entero v Texas
NATIONAL COURT REPORTERS INC 888.800.9656

Brian Keith Ingram JD 264

264

1 nonresponsive.

2 Q. (By Ms. Olson) Sir, how does Ms. Hughs define
3 the words, "smooth, safe and secure"?

4 MS. HUNKER: Objection, asked and
5 answered.

6 **A. The way that our office defines them.**

7 Q. And how do you know that that's how Ms. Hughs
8 personally defines them?

9 **A. She and I talked about this before it was even**
10 **drafted what our purpose was, which to congratulate the**
11 **election administrators and the public for pulling off a**
12 **smooth, safe, and secure election in the middle of a**
13 **pandemic.**

14 Q. So my question was: How does Ms. Hughs define
15 the words, "smooth, safe and secure"?

16 MS. HUNKER: Objection, form. Asked and
17 answered.

18 **A. And again, she answer -- she defines it the way**
19 **our office defines it.**

20 **"Smooth" means relatively problem-free.**

21 **"Safe" means it wasn't a super-spreader**
22 **event.**

23 **"Secure" means that we didn't suffer any**
24 **hacking events.**

25 Q. And -- but she did not discuss with you the

5:21-cv-844 (XR)
5/6/2022

Entero v Texas
NATIONAL COURT REPORTERS INC 888.800.9656

Brian Keith Ingram JD 265

265

1 reason she was making the edits as set out in this
2 email; is that correct?

3 MS. HUNKER: Objection, form.

4 **A. She didn't discuss that particular edit with**
5 **me, but it is consistent with the purpose of the press**
6 **release, as we discussed before it was even drafted.**

7 Q. And do you know how Ms. Hughs defined the term
8 "resounding success"?

9 **A. "Resounding success" just means that we have**
10 **record turnout without it being a super-spreader in the**
11 **middle of a pandemic, it was tremendous.**

12 Q. Did she discuss that phrase with you?

13 **A. I -- we didn't discuss phrase my phrase. We**
14 **discussed, generally, the need to make sure that the**
15 **public and the election officials were commended for**
16 **their efforts in keeping this safe.**

17 Q. What factors did Ms. Hughs consider in order to
18 determine that the election was a resounding success?

19 **A. The same factors that we have already talked,**
20 **the fact that we had record turnout, that it was smooth**
21 **without a great deal of problems, and that it was safe,**
22 **and that it was secure, free from hacking.**

23 Q. And how do you know that?

24 **A. Because that's what we have talked about,**
25 **that's the whole -- that's -- these are the criteria by**

5:21-cv-844 (XR)
5/6/2022

Entero v Texas
NATIONAL COURT REPORTERS INC 888.800.9656

Brian Keith Ingram JD 266

266

1 **which we judge elections.**

2 Q. Does Ms. Hughs consider an election with
3 rampant fraud to be one that is a resounding success?

4 MS. HUNKER: Objection, form. Outside of
5 personal knowledge and speculation.

6 **A. Again, our office wouldn't consider an election**
7 **with rampant fraud to be a resounding success. Every**
8 **election has fraud.**

9 MS. OLSON: Objection, nonresponsive as to
10 the last sentence.

11 Q. (By Ms. Olson) Have you next look at the next
12 document which, I think, will be Exhibit 6.

13 (Exhibit No. 6 marked.)

14 Q. Mr. Ingram, do you recognize Exhibit 6?

15 **A. Yes.**

16 Q. And that's another email chain on November the
17 9th of 2020, this one, the top email at 9:06 p.m.; is
18 that right?

19 **A. I agree with that.**

20 Q. And these same folks were the executive team in
21 the Secretary of State's Office; is that right?

22 **A. That's correct.**

23 Q. And incidentally, you're not part of that
24 executive team; is that right?

25 **A. No.**

5:21-cv-844 (XR)
5/6/2022

Entero v Texas
NATIONAL COURT REPORTERS INC 888.800.9656

Brian Keith Ingram JD 267

267

1 Q. And you weren't at the time?

2 **A. I was not.**

3 Q. And you weren't at the time of the prior
4 exhibit, Exhibit No. 5 which is dated November 9th as
5 well; is that right?

6 **A. That's correct.**

7 Q. And, sir, with respect to Exhibit No. 6 in this
8 email, if we look at the bottom of Page 1, on to the top
9 of Page 2, that's another edit by Ms. Hughs; is that
10 right?

11 **A. I agree.**

12 Q. And she deleted a reference or proposed
13 deleting a reference to the Governor; is that correct?

14 **A. I agree with that.**

15 Q. Did you discuss this particular edit with
16 Ms. Hughs?

17 **A. I did not.**

18 THE REPORTER: Internet went off.

19 MS. OLSON: Let's go off the record.

20 (Brief pause.)

21 Q. (By Mr. Olson) All right. Mr. Ingram, I think
22 we were looking at Exhibit No. 6, which is that email
23 string that is dated 11-9-2020 at 9:06 p.m.

24 Do you have that in front of you, sir?

25 **A. I do.**